

# Exhibit B

# Nelson Mullins

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June 2, 2017

### VIA EMAIL AND U.S. MAIL

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**Re: *Bernardette McBride v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)**

***Plaintiff's Profile Form for Bernardette McBride***

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than May 23, 2017; however, we still have not received a PPF for your client.

Gallagher & Kennedy, P.A.  
Lopez McHugh, LLP  
Fears Nachawati, PLLC  
June 2, 2017  
Page 2

Please send a PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Sanjay Ghosh', with a stylized, sweeping flourish extending to the right.

Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

SG/

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August 14, 2017

### VIA EMAIL AND U.S. MAIL

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**Re: *Bernardette McBride v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)**

***Plaintiff's Profile Form for Bernardette McBride***

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than May 23, 2017; however, we still have not received a PPF for your client.

Gallagher & Kennedy, P.A.  
Lopez McHugh, LLP  
Fears Nachawati PLLC  
August 14, 2017  
Page 2

This is the second overdue letter we are sending since we have not received a response to the first one. Please send a PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'SG' with a stylized flourish.

Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

SG/



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December 19, 2017

**VIA EMAIL AND U.S. MAIL**

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**Re: *Bernadette McBride v. C. R. Bard, Inc., et al.*, Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)**

***Plaintiff's Profile Form for Bernadette McBride***

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due on May 23, 2017; however, we still have not received a PPF for this plaintiff.

This is the third PPF overdue letter we are sending for this plaintiff because we have not received a response to the first two PPF overdue letters we sent to your office.

Gallagher & Kennedy, P.A.  
Lopez McHugh, LLP  
Fear Nachawati Law Firm  
December 19, 2017  
Page 2

Moreover, two (2) complaints have been filed for this plaintiff (Case No. CV-16-01090-PHX-DGC and Case No. 17-00876-PHX-DGC). One of these cases needs to be dismissed immediately.

The defendants will move to dismiss both complaints filed on behalf of this plaintiff if a PPF is not received within 20 days of the date of this letter. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,

Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

SG/



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September 10, 2018

**VIA EMAIL AND U.S. MAIL**

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**Re: *Bernardette McBride v. C. R. Bard, Inc., et al.*, Civil Action No.: MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)**

***Plaintiff Profile Form for Bernardette McBride***

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action.

We note that we still have not received your client's Plaintiff Profile Form ("PPF") despite repeated attempts from our firm seeking the PPF and reminding you that it was overdue. In an effort to receive the PPF, our firm sent you correspondence on June 2,

GALLAGHER & KENNEDY, P.A.  
LOPEZ McHUGH, LLP  
FEARS NACHAWATI LAW FIRM  
September 10, 2018  
Page 2

2017; August 14, 2017; and December 19, 2017 reminding you that the PPF was overdue and asking you to serve a completed PPF in the above-referenced action. To-date, however, we have received no PPF in the above-reference case.

Because no PPF has been forthcoming despite our numerous attempts, this correspondence is to inform you that unless we receive a completed PPF for your client within ten (10) days of the date of this letter, we will move to dismiss the above-referenced case.

Sincerely yours,



Sean M. Kirwin

***Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.***

SK/